

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

United States of America

No. GLR-19-0015

vs.

WILLIAM HICKEY

Defendant

MOTION TO EXTEND REPORTING DATE

Defendant William Hickey, through counsel, Andrew C. White, hereby moves this Honorable Court to extend his reporting date to commence service of his sentence and states as follows:

1. On December 23, 2020, this Court sentenced the Defendant to, among other things, 20 months incarceration. The Court allowed the defendant to self-surrender and ordered that the defendant report to commence service of sentence on Thursday, March 19, 2020.
2. The Bureau of Prisons has recently designated the defendant to report to FPC Lewisburg, located in Pennsylvania.
3. As the Court is aware, the defendant has a wife and two young daughters. His wife recently gained a State license to operate a day care facility and the family was relying on that income to support themselves in Mr. Hickey's absence.
4. Given the current Coronavirus pandemic and the uncertain effect that the National Emergency will have on Mr. Hickey's family both in terms of income and health, he respectfully

requests that his reporting date be rescheduled so that he can care for his family through the course of this ongoing crisis.

5. According a statement from the White House within the past hour, government officials expect that the Coronavirus crisis could stretch into August. *See* <https://www.cnn.com/2020/03/16/trump-admits-that-coronavirus-crisis-could-stretch-into-july-or-august.html>. Given the uncertainty surrounding this unprecedented National Emergency and the fact that Mr. Hickey needs to care for his wife and daughters, we respectfully submit that he should be allowed to extend his reporting date by six months, to September 19, 2020.

6. For these reasons the Defendant respectfully requests, that the Court extend his reporting date to Friday, September 18, 2020.

WHEREFORE, the Defendant respectfully requests that the Court extend his reporting date to September 18, 2020.

Respectfully submitted,

/s/

Andrew C. White
Silverman, Thompson, Slutkin & White, LLC
201 North Charles Street
Suite 2600
Baltimore, Maryland 21201
Email: awhite@silvermanthompson.com
Phone: (410) 576-2200

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of March, 2020, a copy of the foregoing was e-filed via ECF and a copy sent to Judson Mihok, Assistant United States Attorney, 36 South Charles Street, 4th Floor, Baltimore, MD 21201.

_____/s/_____
Andrew C. White